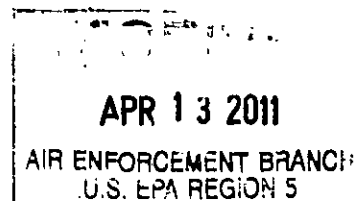


UNIVERSITY OF ILLINOIS
AT CHICAGO

Health and Safety Section (MC 645)
Environmental Health and Safety Office
1140 South Paulina Street, Room 245
Chicago, Illinois 60612-7217

April 11, 2011



United States Environmental Protection Agency
Region 5-Air Branch
US EPA (AR-17J)
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604

RE: University of Illinois at Chicago Annual Air Compliance Certification

Dear Air Compliance Engineer,

Attached is a Form 401-CAAPP-the Annual Compliance Certification. Submittal of this form constitutes the annual compliance certification for the University of Illinois at Chicago, Source 031600GQP, Permit Number 04120061. The University of Illinois at Chicago has three separate Title V permits. This Compliance Certification is only for the conditions in Permit Number 04120061 for a medical research facility. A copy has also been submitted to the Illinois EPA Regional Field Office and the Illinois EPA Air Compliance Unit in Springfield. Please call me at (312) 413-9706 if you require any additional information.

Sincerely,

Heather Jackson, CHMM

A handwritten signature in cursive script that reads "Heather Jackson".

Asst. Director, Chemical Safety and
Environmental Compliance

UIC



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
COMPLIANCE AND SYSTEMS MANAGEMENT SECTION
1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

| | |
|--|---|
| CAAPP ANNUAL COMPLIANCE CERTIFICATION | FOR AGENCY USE ONLY |
| | ID NUMBER: |
| | PERMIT #: |
| | DATE: APR 13 2011 ENFORCEMENT BRANCH |

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

| | | | |
|--|--------------------|-----------------------------|--|
| SOURCE INFORMATION | | | |
| 1) SOURCE NAME: University of Illinois at Chicago | | | |
| 2) SOURCE ADDRESS: 1140 S. Paulina St. 228 PSB M/C 645 | | | |
| 3) CITY: Chicago | | 4) COUNTY: Cook | |
| 5) TOWNSHIP: | 6) STATE: Illinois | 7) ZIP CODE: 60612 | |
| 8) DATE FORM PREPARED: 04/07/11 | | 9) SOURCE ID NO.: 031600GQP | |
| 10) CAAPP PERMIT NO.: 04120061 | | | |
| 11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: 2010 | | | |

| |
|--|
| SOURCE COMPLIANCE INFORMATION |
| 12) CHECK EITHER (a) OR (b) BELOW: |
| (a) _____ During the entire reporting period, this source was in continuous compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit. |
| (b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in continuous compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated. |
| NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition. |

ATTACHMENTS

13) Are you submitting any attachments with this report? Yes ☒ No ☐

If yes, please list the attachments below:

Please see attached Table 1 and 2.

COMPLIANCE CERTIFICATION REPORT MAILING

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

Yes ☒ No ☐

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes ☒ No ☐

SOURCE CONTACT PERSON

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT:

Heather Jackson

16) TECHNICAL CONTACT PERSON TITLE:

Asst. Director, Chemical Safety and Env. Compliance

17) CONTACT PERSON'S TELEPHONE NUMBER:

(312) 413-9706

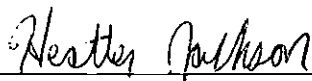
COMPLIANCE STATEMENT AND SIGNATURE BLOCK

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:



Asst. Director, Chemical Safety and Env.

AUTHORIZED SIGNATURE

TITLE OF SIGNATORY

Heather Jackson, CHMM

04 / 07 / 2011

TYPED OR PRINTED NAME OF SIGNATORY

DATE

Table 1- Listing of Compliance Status for Applicable Permit Terms and Conditions

| | | | |
|-----------------------------------|--|-------------------|---|
| Source Name | University of Illinois at Chicago | | |
| Reporting Year | 2010 | | |
| Permit Condition Reference Number | Description of Permit Condition | Compliance Status | Compliance Determination Method |
| Condition 3.2.1 | Particulate matter emission standard | C | Compliance demonstrated through weighing the pathological waste combusted and recording this data. Hourly particulate emission rates are then calculated using AP-42 emission factors. Hourly particulate rates are less than the allowable from the process weight rule. |
| Condition 3.2.2 | VOM emission limit of 8 lbs/hr | C | Compliance demonstrated through weighing the pathological waste combusted and recording this data. Hourly VOM emission rates are then calculated using AP-42 emission factors. |
| Condition 3.3.2 | Limitations on fugitive particulate matter, opacity shall not exceed 30%, no open burning | C | The incinerators are equipped with a device to regulate opacity and periodic visual emission observations are conducted. A method 22 observation is conducted annually. No open burning is allowed on-site. |
| Condition 3.3.3 | Ozone depleting substances- The permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances. | C | The source covered by permit 031600GCP has no ozone depleting substances. |
| Condition 3.3.4 | RMP Requirements | NA | The source is not subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68. |
| Condition 3.3.6 | The Permittee must have on file a written episode action plan. | C | A written episode action plan is on file. |
| Condition 3.6.1 | Permitted emission limits of criteria pollutants and HAPs | C | Compliance demonstrated through weighing the pathological waste combusted and recording this data. Annual emissions of criteria pollutants and HAPs in tons/yr are then calculated using AP-42 emission factors. |
| Condition 3.6.2 | Source-wide HAP limits of 25 tons/yr combined and 10 tons/yr per individual HAP | C | Compliance demonstrated through weighing the pathological waste combusted and recording this data. Emissions of HAPs are calculated on a monthly basis using AP-42 emission factors to demonstrate compliance with this limit. |
| Condition 3.9.1 | Records shall be maintained of total annual emissions on a calendar year basis. | C | Both process data and calculated annual emissions are retained at least five years. |
| Condition 3.9.2 | Records shall be maintained of total annual emissions of HAPs on a calendar year basis | C | Both process data and calculated annual HAP emissions are retained at least five years. |

| Permit Condition Reference Number | Description of Permit Condition | Compliance Status | Compliance Determination Method |
|-----------------------------------|--|-------------------|--|
| Condition 5.9.3 | All records and logs shall be maintained at least five years from the date of entry | C | Records are kept for five years of the following: dated temperature strip charts, type of waste combusted, weight of waste combusted, start time of incineration, end time of incineration, initial temperature, final temperature, and maintenance records. |
| Condition 5.10.1 | Deviation Reporting Requirement: Any deviation from permit requirements must be promptly reported to Illinois EPA | C | No deviations occurred during this reporting period. |
| Condition 7.1.3(b) | Incinerator particulate emissions shall not exceed 0.1 gr/scf of effluent gases corrected to 12% CO ₂ | C | Slack testing was performed on the incinerator to demonstrate compliance with this particulate standard. |
| Condition 7.1.3(c) | Incinerator CO emissions shall not exceed 500 ppm, corrected to 50% excess air. | C | Slack testing was performed on the incinerator to demonstrate compliance with this particulate standard. |
| Condition 7.1.5 a | Only pathological is allowed to be incinerated | C | The type of waste incinerated is recorded in an Excel spreadsheet for every incinerator burn. Only pathological wastes is burned. |
| Condition 7.1.5 b | The secondary combustion chamber of the incinerator shall be heated to 1400 F prior to introducing waste. This temperature shall be maintained until burnout is complete. | C | Records are kept of the dated temperature chart recorder for each burn. Also, the initial and ending temperature for each burn is recorded in an Excel spreadsheet. |
| Condition 7.1.5 c | The Permittee shall conduct tune-up of the incinerator's burners on an annual basis or on as needed basis, whichever comes first. | C | The incinerator is serviced on the frequency recommended by the manufacturer, annually. |
| Condition 7.1.5 d | The condition of the incinerator shall be inspected on a periodic basis and deficiencies should be expeditiously repaired. | C | The incinerator is inspected annually by the manufacturer. Also, it is inspected regularly by the incinerator operator on a more frequent basis. |
| Condition 7.1.6 | Charging waste rate shall not exceed 150 lbs/hr. Compliance with hourly charging rate shall be determined continuously and supported by hourly records kept at the source. | C | The waste combusted is always weighed and the weight recorded prior to each burn. |
| Condition 7.1.7c | The Permittee shall conduct annual opacity observations by a certified observer in accordance with USEPA Method 9. | C | An outside consultant performs a Method 9 observation on an annual basis. |
| Condition 7.1.8 | The affected incinerator shall be equipped with a secondary combustion chamber temperature indicator with continuous recorder | C | Records are kept of the dated temperature strip chart for each burn. Also, the initial and ending temperature for each burn is recorded in an Excel spreadsheet. |
| Condition 8.5 | Reports of any tests conducted as required by this permit or as the result of a request by Illinois EPA shall be submitted. | C | Slack test results for the incinerator were submitted with the initial CAAPP application. |

| Permit Condition Reference Number | Description of Permit Condition | Compliance Status | Compliance Determination Method |
|-----------------------------------|--|-------------------|---|
| | Semi-annual monitoring reports shall be submitted to Illinois EPA by January 31 and July 31 of each year | I | UIC failed to submit the semi-annual monitoring report for the period of January 1, 2010-June 30, 2010 by the stipulated deadline. This report was submitted September 23, 2010 to the Illinois EPA Compliance section as well as the appropriate deviation report. |
| Condition 8.6.1 | All equipment covered under this permit shall be maintained in a manner not to cause violation of any applicable requirements. | C | The incinerator is maintained per the manufacturer's schedule. |
| Condition 9.2.2 | | C | The annual air emission fee was submitted in 2010 and documentation retained. |
| Condition 9.2.5 | Duty to Pay Fees | C | |
| Condition 9.7 | The Annual Emission Report shall be submitted by May 1 of each year | C | The Annual Air Emission Report was submitted in 2010 and documentation retained. |
| Condition 9.8 | The Annual Compliance Certification shall be submitted by May 1 of each year | C | The Annual Air Compliance Certification was submitted in 2010 and documentation retained. |

Deviation

| Permit Condition Reference Number | Description of Permit Condition | Deviation Period Start Date | Deviation Period End Date | Description and Cause of Deviation | Corrective Action Taken to Remedy Deviation | Measures Taken to Prevent Future Deviations |
|-----------------------------------|--|-----------------------------|--|---|--|---|
| Condition 8.6.1 | Semi-annual monitoring reports shall be submitted to Illinois EPA by January 31 and July 31 of each year | 31-Jul-10 | The semi-annual monitoring report and deviation report was submitted September 22, 2010. | UIC failed to submit the semi-annual monitoring report for the period of January 1, 2010-June 30, 2010 by the stipulated deadline. Due to state hiring freezes and limited funding, UIC was without an Environmental Coordinator and a Director for the Environmental, Health, and Safety Office for over a year and a half. The vacancies caused the timely submittal of the 2010 semi-annual compliance monitoring report for the compliance period of January 1, 2010-June 30, 2010 to fall through the cracks. However, the source conducted all required monitoring during this reporting period and was in compliance with all permit conditions. | This report was submitted September 23, 2010 to the Illinois EPA Compliance section as well as the appropriate deviation report. | An experienced environmental director has now been hired with several years of experience in air permitting and compliance. To prevent future similar compliance issues, a digitized environmental compliance calendar is being created which will alert departmental management several weeks before all air compliance reports are due and continue to send an escalating series of e-mails until the report is submitted. Also, a departmental Air Compliance Manual is being written so in the event of future vacancies, written instructions exist detailing UIC's air compliance responsibilities. |

| Date | Time | Location | Weather | Remarks | Remarks | Remarks |
|----------|-------|----------|---------|---------|---------|---------|
| 10-10-68 | 10:00 | 1000 | 1000 | 1000 | 1000 | 1000 |
| 10-10-68 | 10:00 | 1000 | 1000 | 1000 | 1000 | 1000 |
| 10-10-68 | 10:00 | 1000 | 1000 | 1000 | 1000 | 1000 |
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